

Guidance document

Benchmark *FEFAC Soy Sourcing Guidelines* 10 November 2015

For discussion with FEFAC Soy Drafting Group

Guidance document for benchmark process

This document provides background information about the benchmarking process to determine compliance of schemes for responsible soy with the FEFAC Soy Sourcing Guidelines.

Roles and responsibilities

The following roles and responsibilities between FEFAC and the International Trade Centre (ITC) can be distinguished.

FEFAC:

- Developed the Soy Sourcing Guidelines and verification rules
- Established the decision rules (major versus minor, timing of the measures etc.) and provides guidance to ITC when different interpretations of a FEFAC criterion appears to be possible
- Invited scheme owners to use the self-assessment tool and to apply for the formal benchmark

ITC:

- Built the online FEFAC benchmark tool which includes self-assessment and benchmarking sections
- Supports scheme owners to include their data in the Standards Map database (global online voluntary sustainability standards tool that serves as a base for the FEFAC benchmarking tool)
- Checks whether all data are included properly in the Standards Map database
- Asks for more information about a scheme when needed (e.g. audit reports, emails by certification bodies, certification procedures, documents about training of auditors and proof of accreditation etc).
- Executes impartial benchmarking exercise following the decision rules of FEFAC Soy Sourcing Guidelines
- Controls whether or not a scheme fulfils the requirements as set by the FEFAC Soy Sourcing Guidelines.
- Collects all documentation about a scheme in its archive
- Publishes participating schemes in the benchmarking tool and in case schemes are compliant with the FEFAC Guidelines publishes their logos on the homepage of the benchmarking tool www.standardmap.org/fefac
- Publishes all the information about the schemes on www.standardsmap.org

The benchmark process

Opportunity for self-assessment

Before the formal benchmark starts, scheme owners can make use of the self assessment tool to pre-check whether their scheme complies with the FEFAC Soy Sourcing Guidelines. Several

scheme owners made use of this opportunity. Although the self-assessment gives a good indication of compliance to the FEFAC Soy Sourcing Guidelines, it has no formal status.

Formal application

A scheme owner can apply for the formal benchmark at ITC via www.standardsmap.org/fefac. By applying for the formal benchmark the scheme owner also agrees with the publication of his scheme on Standards Map (www.standardsmap.org). Not all soy schemes which are now present in the Standards Map are included in the benchmark. Every scheme needs to formally apply for the benchmark first.

Include all data of the scheme in the ITC database

After the formal application, ITC provides more information about the benchmark process to the scheme owner and the scheme owner receives the log-in information for entering *all information about its scheme* in the Standards Map database (not only the items relevant for the FEFAC Soy Sourcing Guidelines). In case a scheme owner has questions on how to enter the data, ITC is always available for giving guidance and provide more explanation.

When all information about a scheme is submitted to the database, ITC checks the accuracy of the data (e.g. Is all information allocated at the right place in the database? Is there no missing information?). ITC also asks the scheme owners to fill in a specific Excel file about the verification requirements in accordance with the FEFAC Soy Sourcing Guidelines. After all information has been entered correctly in the database, the real assessment starts.

Compliance assessment by ITC

Based on the data entered in the database, ITC assesses whether:

- All essential criteria and at least five of the desired criteria of FEFAC were in the standard
- The timing of the criteria corresponds with the one required in the FEFAC Soy Sourcing Guidelines.
- All verification requirements are met

After this assessment ITC provides feedback to the scheme owner. The following outcomes are possible

1. The scheme is in compliance with the FEFAC Soy Sourcing Guidelines and the scheme owners receive official confirmation of the positive result.
2. ITC is unable to do the final compliance assessment because clarification about certain criteria is needed. Arguments and additional evidence is exchanged between scheme owner and ITC (e.g. audit reports, certification protocols, accreditation certificates etc.). ITC then executes the benchmark and comes to a final decision and reports back its decision to the scheme owner.
3. The scheme is not in compliance with the FEFAC Soy Sourcing Guidelines. ITC reports back to the scheme owner on which criteria the scheme is not compliant yet. It is up to the scheme owner to make the necessary amendments in its scheme in order to be able to become compliant with the FEFAC Soy Sourcing Guidelines. After the amendments have been realized, the formal benchmark can be executed again by ITC.

Procedure for unclarities

In the benchmark ITC compares the texts of the criteria of a certain scheme with the criteria of the FEFAC Soy Sourcing Guidelines. The FEFAC Soy Sourcing Guidelines are written down as

straight-forward as possible. In some cases however questions came up about the exact meaning of certain criteria. Therefore additional information and guidance has been given in discussions with the Working Group of FEFAC. Because transparency in this process is crucial this guidance is being described in the following table.

Detailed explanation per criterion

During the benchmark process some scheme owners asked for further explanation about certain criteria. Also more generic questions were raised. In the scheme below this further explanation is given.

General points	Explanation
Legal requirements versus scheme requirements.	Most schemes that applied for the benchmark include the explanation that in case legislation is stricter than the scheme requirements, legislation is leading. This is logical as no scheme or standard wants to encourage illegal activity.
Desired and essential	For all essential and at least five of the desired criteria in the FEFAC Soy Sourcing Guidelines holds that these items need to be covered (as majors or deal breaker) in the soy schemes.
Voluntary add-ons of schemes	Some schemes work with voluntary modules. In the benchmark it will be explicitly mentioned whether or not the add-ons of a certain scheme need to be included in order to be compliant with the FEFAC guidelines.
FEFAC criteria	Explanation
4. Children under 15 (or a higher age as established in national law) do not carry out productive work. Young workers (15-18) must not undertake hazardous work that jeopardizes their health and welfare.	Questions were raised whether the intention of the FEFAC Soy Sourcing Guidelines is to never allow a farmer to let his own children help him in the field. This is not the case. Those schemes that specify in a clear manner the conditions under which the own children of a farmer can assist in the field, guaranteeing their safety, well being and education are in line with the FEFAC guidelines.
5. There is no engagement in, support for, or tolerance of any form of discrimination.	This item is based on ILO Convention 111. With any form of discrimination FEFAC means discrimination based on gender, color, age, race, religion, sexual orientation, national origin or disabilities unrelated to job requirements.
10. Overtime in excess of 12 hours per week is only allowable if it happens in extraordinary, limited periods where there are time constraints or risks of economic loss and where conditions regarding overtime in excess of 12 hours per week have been agreed between workers and management	What is meant here is that only when exceptional circumstances are at stake (e.g. there is a risk of huge harvest loss because of specific weather forecasts or plagues) it is allowed to work more extra hours than the 12 per week. This can only be done if workers and management agree on this and it is not allowed to do so on a structural basis.
15. Medical treatment / first aid shall be provided without delay and first aid kits are present at all permanent sites and in the vicinity of fieldwork.	If a scheme comes up with criteria and demands monitoring that 'adequate and quick medical assistance is provided without delay' and also demonstrated how this is done, this FEFAC requirement is covered.
22. Gross wages comply with national legislation and sector agreements.	In the FEFAC Soy Sourcing Guidelines no explicit reference is made to the fact that the one providing the better reward (legal requirements or sector agreements) is leading. Most schemes do mention this and this is in line with the intention of the FEFAC Soy Sourcing Guidelines.
26. The farmer complies with the legislation relevant for the expansion of soy production (e.g. land ownership, biodiversity legislation, forest legislation, land management policies).	This is explicitly mentioned because the FEFAC Soy Sourcing Guidelines consider <i>prevention of illegal deforestation and adequate verification of this</i> of major importance

27. Areas that are assigned as legal reserve, conservation area or otherwise secured by law have to be protected. These areas must be restored to its former state if any alteration has taken place or legally approved compensating actions should be taken.	This is explicitly mentioned because the FEFAC Soy Sourcing Guidelines consider <i>restoration of legally protected areas to its former state when alterations have taken place</i> of major importance
29. Important on-farm biodiversity should be maintained and safeguarded through the preservation of native vegetation. There is a map of the farm which shows the native vegetation and there is a plan to protect and recover native vegetation.	Questions were raised whether this item goes beyond legal compliance. It could potentially go beyond legal compliance and is about what farmers can do to protect the biodiversity on their property, even when there is no legal requirement to do so. We have seen that in soy standards there are 2 approaches to treat this item. The first one is to ask for a HCVA-analysis, mapping the important biodiversity and if needed recovering native vegetation. The second one is about maintaining buffer zones around water and setting aside steep slopes and other sensitive parts of the ecosystem.
35. Efforts are made to reduce the use of fossil fuels.	Remarks were given that farmers already have a strong financial incentive to reduce fossil fuel use, but that it is not clear from this criterion how much the reduction should be, whether the use of fossil fuels should decline each year and how the specific circumstances of agricultural production are taken into account. In the FEFAC Soy Sourcing Guidelines only a general reference to the existence of a programme to reduce fossil use had been made. It is up to the specific scheme to define measures, targets and take into account specific agricultural circumstances.
36. Good agricultural practices are implemented to minimize diffuse and localized impacts on surface and ground water quality from chemical residues, fertilizers and erosion or other sources. <i>*for example maintaining a buffer zone around water bodies, treating waste water, precision farming etc.</i>	Remarks were made that this criterion overlaps with other criteria in the FEFAC Soy Sourcing Guidelines and that the following items all together also lead to the protection of water quality: - Applying, storing and disposal of fertilizers and agrochemicals in accordance with the labels and legal requirements - Preventing spillage and leakages of dangerous substances - Maintaining a buffer zone around water bodies - Making efforts to reduce water use - Making sure all waste is collected and disposed in an appropriate manner This is correct. Schemes that include all the above mentioned items without explicitly making a reference to good agricultural practices were accepted. Although it is advised to scheme owners that in the next revision of their schemes an explicit reference to the notion of good agricultural practices for water quality will be made.
37. Any direct evidence of localized contamination of ground or surface water is reported to, and monitored in collaboration with local authorities.	Programmes that include monitoring of water quality, actively work on prevention of contamination and act legally compliant in terms of reporting contamination to local authorities are in line with the FEFAC Soy Sourcing Guidelines.
40. The farmer has knowledge of techniques* to maintain and control soil quality (physical, chemical and biological) and the relevant techniques are implemented. <i>*for example: precision farming, residue management, crop rotation, no tillage,</i>	Remarks were made that measures to prevent erosion often also protect soil quality, and that therefore the criterion on soil quality and soil erosion are overlapping. According to the FEFAC Soy Sourcing Guidelines there is a difference between the measures to prevent soil erosion caused by water and wind, and measures to make sure the biological, chemical and physical characteristics of soils are safeguarded.

contour tillage, grass, waterways, terraces, nitrogen-fixing plants, green manures and agro-forestry techniques.	
45. There is no application of pesticides within 30 meters (or more when as such prescribed in national legislation) of any populated area or water body and all necessary precautions are taken to avoid people entering into recently sprayed areas.	This is a minimum requirement. When national legislation demands more than 30 meters, this is of course leading. In case there is no specific reference to 30 meters, a scheme has to provide evidence that the effect of the measures in its own scheme leads to the same result.
46. Agrochemicals shall be applied using methods that minimize harm to human health, wildlife, plant biodiversity, and water and air quality.	Remarks were received that this item is very general in nature, and that all other FEFAC Soy Sourcing criteria on agrochemical application together add up to this one 'principle'. This is correct. Schemes that include all FEFAC Soy Sourcing criteria on agrochemical application without explicitly making a reference to this general principle were accepted.
47. Aerial application of pesticides is carried out in such a way that it does not have an impact on populated areas and water bodies. All aerial application is preceded by advance notification to residents within 500 m (or more when as such prescribed in national legislation) of the planned application. There is no aerial application of pesticides in WHO Class Ia, Ib and II within 500 m (or more when as such prescribed in national legislation) of populated areas or water bodies.	This is a minimum requirement. When national legislation demands more than 500 meters, this is of course leading. In case there is no specific reference to 500 meters, a scheme has to provide evidence that the effect of the measures in its own scheme leads to the same result.
48. Use of phytosanitary products follows legal requirements (or professional recommendations) in the country of origin and measures to prevent resistance should be taken.	Questions were raised what is meant with 'measures to prevent resistance'. The rotation of active ingredients is the most commonly used measure. Other examples are: using agro-ecological techniques, crop rotation, precision farming using satellite data/drone images/remote sensing.
49. Systematic measures are planned and implemented to monitor, control and minimize the spread of invasive introduced species and new pests.	Remarks were made that is often is not the task of the farmer to monitor the spread of invasive species but of local authorities. The FEFAC guidelines want the farmer to be legal compliant on this issue, warn the competent authorities in case of an invasive species, keep record of diseases and plagues and take adequate measures to stop a certain invasive species.
50. Appropriate measures are implemented to allow for coexistence of different production systems.	This criterion means that measures are taken to make sure different production systems can go together. So it is about adequate communication with neighbours, measures like reduction of drift, application of chemicals and fertilizers in accordance with good practices, protection of water quality.
51. A plan for Integrated Crop Management is made and implemented which includes adequate and continuous monitoring of crop health, use of nonchemical and chemical control means and measures to improve crop resilience. The plan should contain targets for	Remarks were made that the FEFAC criteria on agrochemicals together already add up to Integrated Crop Management. An explicit reference to Integrated Crop Management (ICM) is however needed. ICM is not only about individual measures but is also a way of working, about continuous improvement and about monitoring progress.

reduction of potentially harmful phytosanitary products over time.	
52. There is documented evidence of rights to use the land (e.g. ownership document, rental agreement, court order etc.).	In case a farmer does not have the documented evidence (for example due to lengthy governmental procedures), but can prove he is in the process of maintaining the documents and there is no disputed land claim or conflict going on, it is in line with the FEFAC Guidelines.
58. The complaint mechanism (e.g. written complaint form, being accessible via email, phone or written post) is transparent has been made known and is available to local communities and traditional land users.	With an adequate complaint mechanism is meant: easily accessible (telephone, email, personal communication), for free and timely response
Verification: self-assessment and second party verification route (Question 1,2,3,4,5,6, 9 or the verification checklist) The following approaches are accepted: - Group certification including third party verification of the internal control system and a sample of farmers. - Second party verification of the supply base of a trader, including a check by a third party of the internal control system and a sample of farmers. - Farmer's self assessment including third party verification of the internal control system and a sample of farmers Verification: third party verification route (Question 1,2,7,8,9 of the verification checklist) The following approach is accepted: - Individual certification of all farmers, with an initial audit of 100% of the farmers and surveillance audits no less than once every three years.	In the FEFAC guidelines is stated that a 3rd party verification body needs to be accredited by ISO 17021 and/or ISO 17065. If a 3rd party verification body is able <u>to prove</u> that he operates in line with ISO 17021 and/or ISO 17065 this is also accepted. Proof has to be delivered on this by an independent competent party in a publicly accessible report.